

SECTION 11 - MAINTAINING EMERGENCY PREPAREDNESS

11.0 SCOPE

The Nuclear Safety Section is responsible for coordinating the resources of the Department of Health for response to radiological emergencies. This responsibility entails:

- ensuring plans and procedures are updated;
- organizing and conducting training;
- participating in and coordinating emergency drills and exercises;
- providing and maintaining instrumentation and equipment, and
- conducting or participating in audits, both internal and external.

In addition, the program will provide support and coordination for the Department's response with other involved agencies such as FEMA, NRC, US DOE and their contractors, other state agencies, affected counties, and the nuclear facilities.

11.1 EMERGENCY PLAN AND PROCEDURE MAINTENANCE PROGRAM

The **Radiological Emergency Response Plan and Procedures** is a controlled document that is revised, distributed, and maintained by the Nuclear Safety Section of the Division of Radiation Protection. The original document was published in 1979. Past revisions are on file.

The Supervisor of the Nuclear Safety Section has overall responsibility and authority for the maintenance of the plan and procedures and functions as the Division's Emergency Preparedness Planner. Each of the Program Managers (Energy Northwest and DOE-RL) is responsible for maintaining their respective portions of the plan and procedures. Other aspects of the plan, such as: equipment maintenance, the Emergency Response Training Program, and Quality Assurance are assigned to other staff of the Nuclear Safety Section. Various planning functions may be delegated to section staff as deemed appropriate by the supervisor.

Current procedures reflect official statements of State policy, and serve as a guide to implement actions that will promote the intent of the policy.

Revisions to the **Radiological Emergency Response Plan and Procedures** undergo a review to ensure that:

- new information is technically correct and appropriate to the section;
- new information is useful as prescribed in the procedures;
- other staff expertise may be utilized for pre-publication input,
- out-of-date or incorrect information is updated or deleted.

When revisions are made, the entire section will be updated unless the changes are very minor or "editorial" in nature. The revised sections will indicate the revision date and revision number in the footer. The location of the revised text will be indicated by revision bars in the margin. The List of Effective Pages (LOEP) will be updated with each revision and will indicate the most current

revision for each section. "Editorial" revisions will not be marked. Editorial revisions are those that are made to correct a typographical error or other similar corrections. Revisions that do not change the intent or effect of the plan or procedure are also considered editorial.

Official revisions are issued annually as needed. A full review of the document is completed on a three-year cycle. Telephone numbers will be verified accurate quarterly and updated as necessary. The *Plan and Procedures* will be certified as current annually as a part of the Annual Letter of Certification (PR-1 report) to FEMA.

The distribution list of the document is listed in Appendix E. Distribution includes DRP staff, Department of Health officials, other state agencies, federal agencies, counties, and utilities that may potentially be affected by a radiation emergency.

11.2 EMERGENCY RESPONSE TRAINING PROGRAM

The Emergency Response Training Program (ERTP) ensures that staff retain the skills and qualifications to respond in specific roles, as identified in the official plan and procedures.

A database is maintained by the Nuclear Safety Section that identifies staff who have completed training and participated in scheduled drills/exercises, and are qualified for those specific duties and/or roles. While the database is comprehensive in recognizing qualifications for individual staff, a **Core List** of assignments are produced *each year* from the database, and also considering staff interests and skills.

In order to be placed on the Core List initially, individuals must:

- complete Radiation Response Basics Training, and
- complete Specific Role Training, and/or
- have personal training, skills, and abilities evaluated.

The Core List is updated annually. To maintain qualification, individuals must:

- complete required refresher training, or
- participate in Drills/Exercises, as scheduled.

The specifics for administration of the training program, including the training matrix, are contained in the *Emergency Response Training Program Manual*. Each position specific training includes, among other things, the position's responsibilities for the transmission of emergency information and instructions.

NOTES:

The ERTTP provides annual training internally to DOH responders for most identified response roles. Training may also be provided by the facility or other State Agencies (examples: Dose Assessment Computer Code Use, maintained by the facility, or Protective Action Decision-Making, a joint agency process). For years that specific role training is not offered internally, experience in a drill or exercise participation in that specific role may be substituted.

Staff retain their qualifications for three years after assignment on a Core List.

Staff are only identified for one position per year on the Core List, even if they are qualified for more than one. This ensures coverage of all response positions for two shifts without duplication, in the case of a major radiological emergency.

Staff may "train into" other roles for future Core List assignments, even if they are identified in a different role on the current Core List.

11.2.1 Training Matrix Summary

	ERO	Facility Specific	Position Specific	Supplemental
Div. Dir.	I	I	I/A	
State Health Officer	I	I	I/A	
EOC RHP	I	I	I/A	
NE	I	I	I/A	
SHL	I	I	I/A	
DAC	I	I	I/A	
DA	I	I	I/A	
FT Coord.	I	I	I/A	
Tech Spoke	I	I	I/A	
EW/AC RHP	I	I	I/A	
Dose Track	I	I	I/A	
Lab Liaison	I	I	I/A	
FT Captain	I	I	I/A	
FT Member	I	I	I/A	
Initial Responder	I	I	I/A	
ERDO	I		I/A	

I - initial

A - annual refresher (may be satisfied by participation in a drill or exercise)

ERO - Emergency Response Overview - An integrated overview of the entire Emergency Response Organization. Includes: Classification and Notification and Communication.

Facility Specific Training - A more in depth training specific for the facility that the responder will report to. This training covers: staffing of the facility, familiarity with the physical facility, communication resources, facility management and organization, roles and responsibilities of all Health responders, and interactions with other facility staff.

Position Specific Training - All training required for a responder to perform all tasks required of the specific position. This includes, for example: Dose Assessment Training, Reactor Fundamentals, Contamination Control, Environmental Sampling, Protective Action Decision Making, etc.

Supplemental Training - This includes training provided by outside agencies that would be an asset but is not essential to performing the responders assigned duties. This can include such things as

Risk Communication, Radiological Emergency Response Organization (RERO), and First Aid and CPR. This training has no required frequency of initial or refresher training except for First Aid and CPR (3 years).

11.2.2 Emergency Preparedness Planner Training

There are additional training / qualification criteria desired for persons assigned as the Division's Emergency Preparedness Planner. Desired qualifications include attending the Emergency Management Institute's (EMI) Emergency Planning course and previous experience in radiological emergency response. Attendance of the EMI Emergency Planning course is not a requirement if the individual has had previous experience in a radiological emergency response program. The individual's qualification will be up to the judgement of the Supervisor of the Nuclear Safety Section.

11.3 DRILLS AND EXERCISES

The Division participates in scheduled drills and exercises with both Energy Northwest and USDOE-RL. It may also participate in drills and exercises with other facilities (Siemens, ATG, US Navy, etc.) as resources permit. The Division's participation in drills and exercises with Energy Northwest will be conducted in accordance with the requirements in NUREG-0654, Rev 1, FEMA REP 1. The Division also participates in scheduling drills and exercises, developing scenarios, and developing objectives and limitations of the drills and exercises.

Communication Drills - When the Division is notified by the State Emergency Management Division of a communication drill at the Columbia Generating Station, the Division will continue the extent of the drill through the Emergency Response Duty Officer to the Division Director and a staff responder as indicated in Sections 1 and 2 of the Plan and Section 1 of the Procedures. Communications with field monitoring teams are tested during annual drills.

Radiological Monitoring Drills - Annual field team training conducted by the Division includes demonstrating the ability to collect samples of all sample media, record keeping, and transmitting results to a simulated EOF.

Health Physics Drills - Health dose assessment staff participate in the utility's Emergency Response Organization (ERO) training drills and the annual drill or exercise, performing evaluation and analysis of simulated elevated releases. The Division will usually participate in more than one ERO drill.

11.4 EQUIPMENT MAINTENANCE PROGRAM

Field team members are expected to rely primarily on the instruments found in the field team kits. The kit inventory of instruments and other supplies are listed in Attachment A to Section 8, Field Operations procedures. For responses to other than commercial reactor accidents, these instruments may be supplemented by specialized instruments from other sections.

Portable radiological survey instruments are calibrated annually by certified laboratories. Functional checks are conducted quarterly. Response checks are conducted on survey instruments prior to use. Maintenance and repair work on equipment is accomplished by the manufacturer or an equivalent provider.

Dosimeters will be calibrated and electrically leak tested annually, which is in accordance with the Washington Administrative Codes (WAC 246-220-100, and 246-243-150-2b.iv.) which meets or exceeds ANSI N13.5-1972 guidelines.

The Division maintains an adequate reserve of calibrated instruments to allow equipment to be rotated for maintenance or calibration without affecting the minimum number of kits available.

11.5 QUALITY ASSURANCE PROGRAM

11.5.1 Audit Program

The Nuclear Safety Section performs effectiveness / performance based audits in order to periodically assess the status and maintain the quality of the Division's Emergency Response program. Audits performed on the Division's Emergency Response program are considered **Internal** audits, regardless of who actually performs the audit. Audits performed by Nuclear Safety and other Division staff on other interfacing programs (i.e. - Columbia Generating Station Emergency Preparedness, USDOE-RL Emergency Preparedness, Siemens Power Corporation Offsite Emergency Planning, Allied Technical Group - Richland, etc.) are considered **External** audits.

Nuclear Safety performs audits on the Columbia Generating Station Emergency Preparedness program as part of its EFSEC contract with Energy Northwest. One of these audits may be performed by Nuclear Safety staff in conjunction with either the Columbia Generating Station QA Program's annual audit or the Emergency Preparedness Program Self-Assessment.

The specifics for administration of the audit program are contained in the *Nuclear Safety Quality Assurance Program Manual*.

Audit subjects

The following are some typical subjects. Portions of a program or an entire program may be audited depending upon the scope of the audit. Usually, the narrower the scope of the audit the deeper the depth of the audit, the broader the scope the shallower the depth.

- Emergency Response Training Program
- Procedure / Document Control Program
- Inventory Control Program
- Equipment Control Program
- Drills and Exercises
- Dose Calculation Codes

11.5.2 Corrective Action Program

The Nuclear Safety Section maintains a system for tracking items / issues that need to be revised or added to the Radiological Emergency Response Plan and Procedures manual or to the Emergency Response Training Program. These items / issues can be plan or procedure errors or suggested enhancements, training issues requiring revision of training modules or techniques, or personnel performance issues.

After each drill or exercise, participants, controllers, evaluators, and observers should be debriefed to determine if any corrective actions are needed. These comments may be either formally or informally submitted to Nuclear Safety. FEMA drill/exercise evaluation comments will be added to

the corrective action file. Comments are also solicited after any training session regarding quality and content of the training.

Once the need for a corrective action has been identified by the Supervisor of the Nuclear Safety Section, the task of implementing the corrective action will be assigned to one of the Nuclear Safety staff. The Supervisor is responsible for tracking these corrective actions and ensuring their timely implementation.

11.6 PUBLIC / MEDIA INFORMATION

Various agencies and programs provide informational publications to the general public and to the media regarding protective actions and other useful information to be used in the event of a radiological emergency. The Department of Health is responsible to review these publications for technical accuracy prior to their issuance.